

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

MELVIN LOWE, :  
: :  
PLAINTIFF, : :  
: :  
-VS- : : CASE No. 2:05-cv-495-wkw  
: :  
MONTGOMERY COUNTY BOARD :  
OF EDUCATION, ET AL. :  
: :  
DEFENDANTS. : :  
:

AFFIDAVIT OF SOPHIA JOHNSON

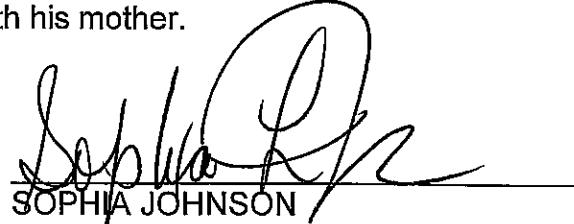
Before me, the undersigned authority, in and for said county and state, personally appeared Sophia Johnson, who being known to me and being first duly sworn, deposes and says under oath as follows:

1. My name is Sophia Johnson. I am a black female over the age of nineteen and I have personal knowledge of the matters set forth herein.
2. I am the Principal of Thelma Smiley Morris Elementary School (TSM).
3. In the summer of 2004, my school was scheduled to be the host site for the Alabama Reading Initiative (ARI). ARI is a statewide program run by the Department of Education. Applicants for positions with this program apply not through MPS, but through the regional in-service center. This position was therefore not posted through MPS. I had no authority over the recommendation or hires with the ARI program.
4. Denita Easterling, a black female, was hired for a position with ARI during the summer of 2004. She was not a summer school principal at TSM that

summer. I did not recommend Easterling for the position, as I did not meet Easterling until ARI selected her to work at the TSM site.

5. Over the course of the summer of 2004, I witnessed the type of organizational and communication skills that I felt were important for the administrative assistant position I had available for the coming term. I subsequently recommended her to be hired as my administrative assistant at TMS for the next school term. She was certified to hold the position.
6. I do not recall Melvin Lowe applying for this position. I have never been told I could not hire Mr. Lowe. I was not aware of any EEOC charge or lawsuit that Melvin Lowe or his mother filed against MPS until I was asked to give this affidavit.
7. I have never made a decision to not hire Melvin Lowe because of his race, sex or any association he had with his mother.

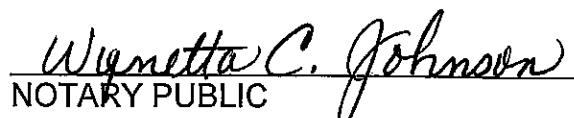
Further affiant saith not.



SOPHIA JOHNSON

STATE OF ALABAMA )  
COUNTY OF MONTGOMERY )

Before me the undersigned Notary Public in and for State and County aforesaid, personally appeared **SOPHIA JOHNSON**, who is personally known to me and who, being by me first duly sworn, doth depose and say that she signed the above affidavit to the best of her knowledge, information and belief and with full understanding of its effect.



Wynetta C. Johnson  
NOTARY PUBLIC

(SEAL)

My Commission Expires: 5/30/2009